

**THE
LEGAL AID
SOCIETY
CIVIL**

Application GRANTED. The Clerk of Court is respectfully directed to ensure that the exhibit at Dkt. No. 23-2 is under seal and to maintain it under seal.

Dated: September 13, 2022
New York, New York

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September 12, 2022

VIA ECF

Hon. Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: ***R.R.M.C. v. Decker*, 22-CV-02952 (LGS)**
Motion for Sealing

Dear Judge Schofield,

The Legal Aid Society writes on behalf of the Petitioner, R.R.M.C., in the above captioned habeas proceeding. We write to respectfully request sealing of ECF No. 23-2, a letter from the International Crime Police Organization ("INTERPOL"). This Court previously granted R.R.M.C.'s motion to file medical documentation under seal and to proceed using initials only. *See* ECF No. 8. On September 9, 2022, we filed a letter-motion to expedite R.R.M.C.'s fully-briefed Motion to Enforce this Court's Stipulation and Order. *See* ECF No. 23. To provide a factual update in R.R.M.C.'s case, we attached a letter from INTERPOL to that motion, ECF No. 23-2, but mistakenly did not redact R.R.M.C.'s name. On September 9, 2022, we alerted the Help Desk of this error and today, September 12, 2022, the Help Desk informed us that the INTERPOL letter, ECF No. 23-2, had been placed under emergency seal. Pursuant to the Southern District of New York's Electronic Case Filing Rule & Instructions Rule 21.7(b), we respectfully request that the INTERPOL letter, ECF No. 23-2, be formally sealed. We have attached a redacted version of the INTERPOL letter to this letter with R.R.M.C.'s name redacted with the exception of his initials. *See* Exhibit A, INTERPOL Letter Redacted. We also respectfully request that counsel for petitioner (Amy Pont for The Legal Aid Society) and counsel for respondents (Carly Weinreb for the U.S. Attorney for the Southern District of New York) have access to this sealed document. We apologize for the oversight in filing an unredacted letter, and we thank the Court for its consideration of this letter.

Respectfully submitted,

/s/ Amy Pont

Amy Pont

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Counsel for Petitioner

cc: Assistant U.S. Attorney Carly Weinreb (via ECF)